

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Misc. No. 17-151-LPS
	)	
BOLIVARIAN REPUBLIC OF VENEZUELA,	)	
	)	
Defendant.	)	

**SPECIAL MASTER’S MOTION AND PROPOSED ORDER  
GRANTING LIMITED EXEMPTION FROM THE STANDING ORDER  
REGARDING PERSONAL ELECTRONIC DEVICES**

Special Master Robert B. Pincus respectfully requests an exemption from the Court’s May 15, 2023 Standing Order entitled *In re: Procedures Regarding the Possession and Use of Cameras and Personal Devices by Visitors to the J. Caleb Boggs Federal Building and United States Courthouse* so that the following attorneys may bring their personal electronic devices to the April 17, 2025 hearing regarding argument on Objections to the Special Master's Recommendation in this matter: Matthew S. Barr, Aaron Curtis, Jared R. Friedmann, Chase A. Bentley and Catherine Balido (collectively “Lead Counsel”).

Lead Counsel will continue to be bound by Federal Rule of Criminal Procedure 53 and Local Civil Rule 83.2 prohibiting photographs or broadcasting.

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Matthew S. Barr (Admitted *pro hac vice*)  
David Lender (Admitted *pro hac vice*)  
Jared R. Friedmann (Admitted *pro hac vice*)  
Chase A. Bentley (Admitted *pro hac vice*)  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Matt.Barr@weil.com  
David.Lender@weil.com  
Jared.Friedmann@weil.com  
Chase.Bentley@weil.com

By: /s/ Myron T. Steele  
Myron T. Steele (#0002)  
Matthew F. Davis (#4696)  
Bindu A. Palapura (#5370)  
Hercules Plaza, 6<sup>th</sup> Floor  
1313 North Market Street  
P.O. Box 951  
Wilmington, DE 19801  
Telephone: (302) 984-6000  
Facsimile: (302) 658-1192  
msteele@potteranderson.com  
mdavis@potteranderson.com  
bpalapura@potteranderson.com

*Counsel for Special Master Robert B. Pincus*

Dated: April 11, 2025  
12165889 / 21202.00001

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2025.

---

The Honorable Leonard P. Stark  
Circuit Judge, United States Court of Appeals  
for the Federal Circuit